

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

VOTER REFERENCE FOUNDATION,)
LLC,) CASE NO: 1:22-cv-00222-JB-KK
)
Plaintiff,)
v.)
)
)
RAUL TORREZ, in his official) JOINT EXHIBIT LIST &
capacity as New Mexico Attorney General, and) PARTIES' EXHIBIT LISTS
MAGGIE TOULOUSE OLIVER, in her)
Official capacity as New Mexico)
Secretary of State,)
)
Defendants.)

JOINT EXHIBIT LIST & PARTIES' EXHIBIT LISTS

COME NOW Plaintiff Voter Reference Foundation, LLC (“VRF” or “Plaintiff”) and Defendants Attorney General Raul Torrez and Secretary of State Maggie Toulouse Oliver (“Defendants”) and state the following:

I. Stipulations as to Joint Exhibits (“JE”) 1-33

1. The Parties stipulate to the authenticity and admissibility of the documents listed below as Exhibits JE1- JE33. Each Party reserves the right to argue that appropriate weight should be given to the documents subject to this stipulation. Defendants reserve the right to argue any objections preserved in response to any discovery requests contained in the Joint Exhibit List.

Joint Exhibit #	Description	Docket # (if previously filed)
JE1	Lippert/Local Labs Voter Information Authorization Form	44-1 filed 6/24/22

JE2	Lippert/Local Labs Receipt	44-2 filed 6/24/22
JE3	VRF December 16, 2021 Press Release	44-13 filed 6/24/22
JE4	VRF December 14, 2021 Email to SOS	44-14 filed 6/24/22
JE5	SOS Criminal Referral of VRF to AG	44-3 filed 6/24/22
JE6	Trujillo Email Transmitting Referral Letter to FBI	44-23 filed 6/24/22
JE7	ProPublica Article	44-4 filed 6/24/22
JE8	Communications between A. Curtas and M. O'Matz	44-19, 44-20 filed 6/24/22
JE9	VRF February 15, 2022 Voter Data Request and Responses Thereto	44-16 filed 6/24/22
JE10	Email(s) with California Secretary of State and AG	44-24, 44-25, 44-26 filed 6/24/22
JE11	Email(s) with Washington AG	119-9 filed 4/14/23
JE12	SOS's Tweets Regarding VRF	32-5 filed 5/17/22
JE13	SOS's Facebook Posts Regarding VRF	32-6 filed 5/17/22
JE14	SOS Press Release	32-7 filed 5/17/22
JE15	February 14, 2022 Voter Information Authorization Form	44-10 filed 6/24/22
JE16	Undated Voter Information Authorization Form	44-8 filed 6/24/22
JE17	February 10, 2022 Voter Information Authorization Form	44-9 filed 6/24/22

JE18	May 27, 2022 NVRA Notice & Request for Records	44-22 filed 6/24/22
JE19	June 16, 2022 Response from C. Lang to VRF re: NVRA Notice & Request for Records	119-11 filed 4/14/23
JE20	VRF October 18, 2022 Request for Records and SOS November 17, 2022 Response Denying Request	119-14 filed 4/14/23
JE21	List of Requestors of Voter Data	44-11 filed 6/24/22
JE22	Documents Received from Aristotle Subpoena	124-2 filed under seal 5/5/23
JE23	House Bill 4	-
JE24	AG Responses to VRF First Discovery	-
JE25	SOS Responses to VRF First Discovery	-
JE26	AG Responses to VRF Second Discovery	-
JE27	SOS Responses to VRF Second Discovery	-
JE28	AG Responses to VRF Third Discovery	-
JE29	SOS Responses to VRF Third Discovery	-
JE30	AG First Supplemental Responses to VRF First Discovery	-
JE31	AG First Supplemental Responses to VRF Second Discovery	-
JE32	AG First Supplemental Responses to VRF Third Discovery	-

JE33	Email from E. Lecocq Supplementing Discovery Responses	119-16 filed 4/14/23
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II. Plaintiff's Exhibits

2. In addition to the Joint Exhibits above to which the parties have stipulated, Plaintiff intends to introduce and rely upon the following exhibits:

Plaintiff's Exhibit #	Description	Docket # (if previously filed)
1	VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
2	NM SOS 06-22-2023 Initial Response to VRF 06-16-2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
3	NM SOS 06-30-2023 First Production of Documents in Response to VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
4	NM SOS 08-16-2023 Status Report to VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
5	NM SOS 08-22-2023 Supplemental Production of Documents in Response to VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
6	VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-

Defendants reserve the right to argue the admissibility and weight of Plaintiff's exhibits.

III. Defendants' Exhibits

In addition to the Joint Exhibits above to which the parties have stipulated, Defendants intend to introduce and rely upon the following exhibits:

Defendants' Exhibit	Description	Docket # (if previously filed)
A	"Complaint" communications received by VRF regarding the publication of voter data (VRF_1_00310 through 000427 and VRF_2_000468 through 517)	-
B	Complaints received by the SOS's Office regarding the publication of voter data	-

Plaintiff preserves its objection that Defendants' exhibits constitute hearsay or hearsay within hearsay.

Respectfully submitted this 29th day of August, 2023.

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Counsel for Defendants

CERTIFICATE OF SERVICE

I, Edward D. Greim, certify that on August 29, 2023, a copy of foregoing was filed with the Clerk of the Court using the CM/ECF system, which sent notification to the following via email:

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/s/ Edward D. Greim

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